

THE LAW OFFICES OF RORY C.  
QUINTANA  
Rory C. Quintana (SBN 258747)  
201 Spear Street, Suite 1100  
San Francisco, CA 94105  
Tel.: (415) 426-3517  
Fax: (415) 426-3518  
rcquintana@rcqlegal.com

DURIE TANGRI  
Daralyn J. Durie (SBN 169825)  
Clement S. Roberts (SBN 209203)  
Joshua H. Lerner (SBN 220755)  
217 Leidesdorff Street  
San Francisco, CA 94111  
Tel.: (415) 362-6666  
Fax: (415) 236-6300  
ddurie@durietangri.com  
croberts@durietangri.com  
jlerner@durietangri.com

Attorneys for Plaintiff HENRY M.  
BURGOYNE, III

ANDERIES & GOMES LLP  
Shane K. Anderies (SBN 215415)  
S. Christine Young (SBN 253964)  
601 Montgomery Street, Suite 888  
San Francisco, California 94111  
Telephone: (415) 217-8802  
Facsimile: (415) 217-8803  
E-mail: sanderies@andgolaw.com  
E-mail: cyoung@andgolaw.com

Attorneys for Defendants  
KARL KRONENBERGER and  
KRONENBERGER ROSENFELD LLP

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HENRY M. BURGOYNE III,

Plaintiff,

v.

KARL M. KRONENBERGER, an individual;  
KRONENBERGER ROSENFELD LLP, a  
California limited liability partnership; and  
DOES 1 through 10;

Defendants.

Case NO. C 11-06376 EDL

**JOINT STIPULATED REQUEST TO  
FILE UNDER SEAL DOCUMENTS  
RELATED TO THE PARTIES'  
MOTIONS FOR PARTIAL SUMMARY  
JUDGMENT AND ~~[PROPOSED]~~  
ORDER**

**[Civ. L.R. 7-11, 79-5]**

Action Filed: December 16, 2011  
Trial Date: August 12, 2013

**I. INTRODUCTION**

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's June 14, 2013 Order

1 Regarding Administrative Motions To Seal (Docket No. 207), Plaintiff Henry M. Burgoyne III  
2 (“Plaintiff”) and Defendants Karl Kronenberger (“Kronenberger”) and Kronenberger Rosenfeld,  
3 LLP (collectively referred to as “Defendants”) jointly submit this stipulated request to file under  
4 seal the following documents:

- 5 1. Portions of Exhibit C to Kronenberger’s Declaration In Support Of Defendants’  
6 Opposition to Plaintiff’s Motion for Partial Summary Judgment As To Accounting  
7 Claim should be redacted to remove references to financial information;
- 8 2. Exhibits D and E to Kronenberger’s Declaration In Support Of Defendants’  
9 Opposition to Plaintiff’s Motion for Partial Summary Judgment As To Accounting  
10 Claim;
- 11 3. Exhibit E to the Declaration of Shane K. Anderies In Support Of Defendants’  
12 Opposition to Plaintiff’s Motion for Partial Summary Judgment As To Accounting  
13 Claim;
- 14 4. Exhibit F to the Declaration of Shane K. Anderies In Support Of Defendants’  
15 Opposition to Plaintiff’s Motion for Partial Summary Judgment As To Accounting  
16 Claim;
- 17 5. Exhibits B and C to Kronenberger’s Declaration In Support Of Defendants’  
18 Opposition to Plaintiff’s Motion for Partial Summary Judgment As to Defendants’  
19 Counterclaims;
- 20 6. A portion of Exhibit A to the Declaration of Rory C. Quintana In Support Of  
21 Plaintiff’s Opposition to Defendants’ Motion for Summary Adjudication should be  
22 redacted to remove the references to the Firm’s server usernames;
- 23 7. A portion of Exhibit G to the Declaration of Rory C. Quintana In Support Of  
24 Plaintiff’s Opposition to Defendants’ Motion for Summary Adjudication should be  
25 redacted to remove the name of a third party;
- 26 8. A portion of Exhibit B to the Declaration of Rory C. Quintana In Support Of  
27 Plaintiff’s Motion for Partial Summary Judgment As To Accounting Claim should be  
28 redacted to remove a reference to a certain Firm client;

9. Portions of Exhibit D to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Accounting Claim should be redacted to remove references to certain Firm clients;
10. Portions of Exhibit H to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Accounting Claim should be redacted to remove all financial information;
11. Exhibit U to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Accounting Claim;
12. A portion of Exhibit D to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Defendants' Counterclaims should be redacted to remove a reference to a certain Firm client;
13. Portions of Exhibit E to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Defendants' Counterclaims should be redacted to remove references to financial information;
14. Exhibit J to the Declaration of Rory C. Quintana In Support Of Plaintiff's Motion for Partial Summary Judgment As To Defendants' Counterclaims;
15. Exhibit W to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Opposition to Defendants' Motion for Summary Adjudication;
16. Exhibit A to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Reply In Support Of Motion for Partial Summary Adjudication As To Defendants' Counterclaims;
17. Exhibit D to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Reply In Support Of Motion for Partial Summary Adjudication As To Defendants' Counterclaims;
18. A portion of Exhibit D to the Declaration of Rory C. Quintana In Support Of Plaintiff's Reply In Support Of Motion for Partial Summary Adjudication As To Defendants' Counterclaims should be redacted to remove reference to the termination accounting;

1 19. A portion of Exhibit B to the Declaration of Henry M. Burgoyne In Support Of  
2 Plaintiff's Motion for Partial Summary Judgment As To Accounting Claim should be  
3 redacted to remove client names and other identifying information;

4 20. A portion of Exhibit A to the Declaration of Henry M. Burgoyne In Support Of  
5 Plaintiff's Reply In Support Of Motion for Partial Summary Judgment As To  
6 Accounting Claim should be redacted to remove references to hours billed in 2011;

7 21. Exhibit O to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Motion  
8 for Partial Summary Judgment As To Accounting Claim;

9 22. A portion of Exhibit R to the Declaration of Henry M. Burgoyne In Support Of  
10 Plaintiff's Opposition to Defendants' Motion for Summary Adjudication should be  
11 redacted to remove credit card information;

12 23. Exhibit B to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Motion  
13 for Summary Judgment As Defendants' Counterclaims; and

14 24. Exhibit C to the Declaration of Henry M. Burgoyne In Support Of Plaintiff's Motion  
15 for Partial Summary Judgment As To Accounting Claim.

16 The exhibits listed above contain sensitive business and personal financial information  
17 that Defendants designated as confidential and/or highly confidential, pursuant to the parties'  
18 September 24, 2012 Stipulated Protective Order. A sealing order is appropriate where, as here,  
19 the document contains private, protectable information. Civ. L.R. 79-5 (sealing order is  
20 appropriate where the party requesting such an order establishes that "the document, or portions  
21 thereof is privileged or protectable as a trade secret or otherwise entitled to protection under the  
22 law"). Accordingly, the parties request that the Court enter an order sealing the aforementioned  
23 exhibits.

24 ///

25 ///

26 ///

27 ///

28 ///

1 Defendants will lodge with the Court unredacted and highlighted copies of the relevant  
2 documents, with the sealable information identified.

3  
4 Dated: June 21, 2013

DURIE TANGRI

5  
6 By: /S/ Joshua H. Lerner  
7 Daralyn J. Durie  
8 Clement S. Roberts  
9 Joshua H. Lerner  
Attorneys for Plaintiff  
HENRY M. BURGOYNE, III

10 Dated: June 21, 2013

ANDERIES & GOMES LLP

11  
12 By: /S/ Shane K. Anderies  
13 Shane K. Anderies  
14 S. Christine Young  
15 Attorneys for Defendants  
KARL KRONENBERGER and  
KRONENBERGER ROSENFELD LLP

16 **Filer's Attestation:** Pursuant to Civil Local Rule 5-1, I attest under penalty of perjury that  
17 concurrence in the filing of the document has been obtained from its signatories.  
18

19  
20 Dated: June 21, 2013

ANDERIES & GOMES LLP

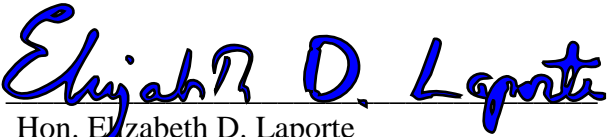
21  
22 By: /S/ Shane K. Anderies  
23 Shane K. Anderies  
24 S. Christine Young  
25 Attorneys for Defendants  
KARL KRONENBERGER and  
KRONENBERGER ROSENFELD LLP

**ORDER**

Having considered the papers regarding the parties' Joint Stipulated Request to File Under Seal Documents Related to the Parties' Motions for Summary Judgment, and finding good cause therefor, the parties' Joint Stipulated Request to File Under Seal Documents Related to the Parties' Motions for Summary Judgment is GRANTED.

IT IS SO ORDERED.

DATED: June 26, 2013

  
Hon. Elizabeth D. Laporte  
United States ~~District~~ Magistrate Judge